

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN THE MATTER OF:**

**CHAPTER 13 CASE NO.:**

**CHAD CARRINGTON**

**19-13358-JDW**

**RESPONSE TO MOTION TO SELL REAL PROPERTY**

COMES NOW Locke D. Barkley, Chapter 13 Trustee, by and through counsel, and files this response to the Debtor's Motion to Sell Real Property (Dkt. #86) (the "Motion") and in support states as follows:

1. The Debtor's plan was confirmed by order (Dkt. #84) on August 6, 2020, for a term of 60 months (the "Plan"). Among the claims provided for in the Plan is that of Planet Home Lending, LLC ("Planet") which is secured by the Debtor's residence, the subject of the Motion.

2. While the Trustee has no objection to the sell of the residence, there should be no change to the claim of Planet or the plan payment until such time as the residence has been sold.

3. The Debtor has claimed an exemption in the subject property in an amount equal in an amount not to exceed \$75,000.00. Any net proceeds remaining above the exempt amount must be paid to the Trustee.

4. The Trustee requests that she be provided with a fully executed HUD-1 Financing Statement following the conclusion of the transaction.

WHEREFORE, PREMISES CONSIDERED, Locke D. Barkley, Chapter 13 Trustee, prays that upon notice and hearing that this Court enter its order granting the Debtor's

Motion but limited as provided for herein and for such other relief to which the Trustee and this bankruptcy estate may be entitled.

Dated: January 4, 2021

Respectfully submitted,  
LOCKE D. BARKLEY, TRUSTEE

BY: /s/ W. Jeffrey Collier  
W. JEFFREY COLLIER, ESQ.  
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**CERTIFICATE OF SERVICE**

I, the undersigned attorney for the Trustee, do hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and I hereby certify that I either mailed by United States Postal Service, first class, postage prepaid, or electronically notified through the CM/ECF system, a copy of the above and foregoing to the Debtor, attorney for the Debtor, the United States Trustee, and other parties in interest, if any, as identified below.

Dated: January 4, 2021

/s/ W. Jeffrey Collier  
W. JEFFREY COLLIER